

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Raquel_Lazo@fd.org

7 Attorney for In Seon Seong

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 IN SEON SEONG,

15 Defendant.

Case No. 12-CR-268-JAD-CWH

UNOPPOSED MOTION TO
MODIFY CONDITIONS TO
PERMIT TRAVEL

(Expedited Treatment Requested)

16
17 Comes now the defendant, In Seon Seong, by and through her counsel of record,
18 Raquel Lazo, Assistant Federal Public Defender, and hereby files this Unopposed Motion to
19 Modify Conditions to Permit Travel. This request is based on the Points and Authorities
20 attached hereto.

21
22 DATED this 7th day of April, 2017.

23 RENE L. VALLADARES
24 Federal Public Defender

25 By: /s/Raquel Lazo

26 RAQUEL LAZO
Assistant Federal Public Defender
Attorney for In Seon Seong

POINTS AND AUTHORITIES

1) On November 22, 2013, Ms. Seong was released on Pretrial Release Bond with conditions. Her travel was restricted to Clark County, Nevada and the State of New Jersey. CR#67.

2) Ms. Seong seeks permission to travel to Huntington Beach, California to visit her daughter and grandson. The family will be celebrating her grandson's birthday. Ms. Seong will leave Thursday, April 20, 2017 and return on Thursday, April 27, 2017. She will stay at her daughter's residence. Ms. Seong has provided the address to Pretrial Services.

3) Ms. Seong has been previously permitted to travel to California to visit her family. There have never been any issues during the travel. Ms. Seong remains compliant.

4) Both the government and Pretrial Services Officer Oliver have no opposition to Ms. Seong's request.

Dated this 7th day of April, 2017.

Respectfully submitted,

By: /s/Raquel Lazo

RAQUEL LAZO
Assistant Federal Public Defender
Attorney for In Seon Seong

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

4/7/2017

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on April 7, 2017, he served an electronic copy of the above and foregoing **Unopposed Motion to Modify Conditions to Permit Travel (Expedited Treatment Requested)** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
KIMBERLY FRAYN
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ Brandon Thomas
Employee of the Federal Public Defender